

**KIRA FERGUSON, individually and  
and as the Executrix of the Estate  
of WILLIAM S. FERGUSON, dec.  
and  
SHANNON FERGUSON, in her  
own right,  
  
Plaintiffs,  
  
v.  
  
SUSAN DOONAN BLACKWELL , f/k/a  
SUSAN DOONAN BIELSKI  
  
Defendant.**

**V.**

**SUSAN DOONAN BLACKWELL , f/k/a )  
SUSAN DOONAN BIELSKI )  
)  
)  
)  
Defendant. )**

On the same day local counsel had to file an opening brief in the Virginia Court of Appeals that was disrupted with issues at the printer engaged for final filing of that brief and counsel was not able to complete the Opposition on that date. Thinking that the weekend would not affect progress of the case given its

current status and the weight of both matters and recency of this case, counsel filed it on Monday.

Plaintiffs' counsel Mary Lynn Tate humbly apologizes to opposing counsel and the Court for this failure to communicate at that time. I believe the circumstances are excusable under the rule and the Court's discretion.

I intended no deliberate delay or other issue and acted as promptly as I could under the circumstances.

Therefore, Plaintiffs and counsel respectfully request that the Court accept this delay and accept the Plaintiffs' opposition.

Kira Ferguson and Shannon Ferguson and counsel respectfully request that this motion be granted.

**PLAINTIFFS BY COUNSEL**

Respectfully submitted,  
/s/ Mary Lynn Tate  
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Co-Counsel for Plaintiffs

## **Certificate of Service**

I hereby certify that on this 29th day of March, 2024, a copy of the foregoing **PLAINTIFFS' MOTION FOR EXTENSION TO FILE OPPOSITION TO DEFENDANT BLACKWELL'S MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION** was filed ECF, sent via electronic mail for filing and service on counsel for Defendant.

/s/ Mary Lynn Tate

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